



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



STEVEN E. CHESTER
DIRECTOR

October 26, 2005

Mr. Charles B. Bellmore
Director of Utilities
City of Mount Clemens
One Crocker Boulevard
Mount Clemens, Michigan 48043

Dear Mr. Bellmore:

SUBJECT: Operating Plan Approval
City of Mount Clemens Septage Receiving Facility

Review of your response to our October 10, 2005, Septage Receiving Operating Plan review letter is complete. The response adequately addresses our concerns. The operating plan is approved. The receiving facility must operate in accordance with the approved plan. If a change in operations or conditions is anticipated, please file an amendment to the plan at least thirty days prior to the proposed date for implementation.

If you have any questions regarding this matter, please contact me at the number below.

Sincerely,

Brett A. Wiseley
On-Site Wastewater Unit
Drinking Water and Environmental Health Section
Water Bureau
517-241-1452

BAW:DLR

cc: Mr. Jack Patel, Spalding, Dedecker Assoc., Inc.
Mr. Richard Falardeau, Water Bureau, DEQ
Mr. Matthew Campbell, Water Bureau, DEQ
Ms. Jodi Peace, Southeast Michigan District Office
Ms. Laura Pobanz, Macomb Co. Health Dept.



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Director of Utilities
City of Mount Clemens
One Crocker Boulevard
Mount Clemens, MI 48043

Dear Mr. Bellmore:

Review of the Operating Plan For Septage Disposal (the "Plan"), submitted September 2, 2005, has been completed. The Plan was overall very well done. There are a few items that must be addressed before the Plan can be approved. These are as follows:

- Does the treatment plant limit septage discharges during significant wet-weather events to ensure that septage waste does not enter waters of the state, or are other control measures in place (such as discharge location, use of the retention basin, etc.)?
- If so, how is this communicated to septage haulers?
- Does the facility accept the discharge of undiluted (not blended with septage) restaurant grease? If so, does this conflict with the discharge prohibition against substances that may solidify or become viscous (as outlined on page 12)? Also, Part 117 (11701(i)) requires food establishment septage to be blended at a 1:3 ratio prior to discharge at a receiving facility.
- On page 13, the Plan limits mercury to 0.0005 mg/l. Septage typically contains mercury levels in excess of this limitation. How can this apparent conflict be remedied?

A response to this review should be submitted within two weeks. If you have any questions regarding this matter, please contact me at the number below.

Sincerely,

Brett A. Wiseley
On-site Wastewater Unit
Drinking Water and Environmental Health Section
Water Bureau
517-241-1452

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I. SEPTAGE RECEIVING FACILITY ADDRESS

The septage receiving facility is located at the City of Mount Clemens Wastewater Treatment Plant (WWTP). The street address of the facility is 1750 Clara Street, Mount Clemens, MI 48043.

Contact Person: Mr. Charles B. Bellmore, Director of Utilities
Telephone # 586 – 469 – 6889
Fax # 586 – 469 -7698

I. SEPTAGE RECEIVING FACILITY ADDRESS

The septage receiving facility is located at the City of Mount Clemens Wastewater Treatment Plant (WWTP). The street address of the facility is 1750 Clara Street, Mount Clemens, MI 48043.

Contact Person: Mr. Charles B. Bellmore, Director of Utilities
Telephone # 586 – 469 – 6889 Ext. 501
Fax # 586 – 469 -7698

II. HOURS OF OPERATION

The receiving facility is open for receiving the septage from approved and permitted septage haulers during the following hours of operation:

Monday through Friday	7:00 AM to 11:00 PM
Saturdays and Sundays	7:00 AM to 11:00 AM

III. CATEGORY OF SEPTAGE WASTE FACILITY WILL ACCEPT

Disposal of septage in southeastern Michigan is becoming a large problem. As land disposal sites become scarcer and many wastewater treatment plants are refusing to accept septage. Independent septage haulers are having difficulty in disposing of waste. City of Mount Clemens WWTP is currently accepting septage waste at the WWTP and is in continued compliance with the NPDES permit. Therefore, as long it is cost effective to operate the receiving facility, the City intends to provide the needed service of septage disposal. In addition, we believe that there may even be excess future capacity due to the conservative design criteria and excess capacity gained by separating the combined sewer in the city. The WWTP received 1,671,000 gallons of septage and Vactor solids during the year 2004. The facility currently charges 4.7 cents per gallon of septage, \$300.00 per Vactor truck for disposal and \$15.00 per Porta-John. The septage quantities are assuming that each truck was 2,500 gallons each. Assuming that the septage received was 35 weeks/year and 5 days/week, the quantity received is approximately 9,600 gallons per day.

This is what we accept:

- Household septage – the septage pumped from home septic tanks, recreational vehicles (RV), cesspool, portable toilets, type III marine sanitation device (s), or similar storage or treatment works that receives only domestic wastes.
- Sanitary Septage from business or industry only on a pre-approved basis.
 - A restaurant septic hauler must submit documentation that the grease trap is cleaned monthly.
 - Septage from a pre-approved industrial facility may be pre-tested for permit parameters. The hauler shall pre-pay for testing the waste, prior to testing in accordance with the City of Mount Clemens estimated cost for testing.
- Vactor solids from catch basin or sewer cleanings from public roadways or pre-approved business or industry. The Car Wash pits are not permitted to discharge sludge.

Compliance & Enforcement

- Permitted Septic/Vactor haulers receiving permit control documents are subject to the same enforcement actions as sewer customers under the City's Industrial Pretreatment Program.

- Federal regulations [40 CFR 403.5 (a) (1)] prohibit non-domestic discharges of pollutants to a POTW, regardless of their mode of entry, that would cause pass through or interference. Waste hauler discharges to a POTW, fall within the scope of the General Pretreatment Regulations [40 CFR 403.8 (f) (1) and (2)]. These prohibitions apply not only to toxic pollutants, but also to excessive concentrations of conventional and non-conventional pollutants. In addition, if the load has originated from a categorical industry, it remains subject to EPA's categorical pretreatment standards (i.e., it cannot be introduced into the POTW unless it has been treated to the level prescribed by the applicable categorical standards). If the hauled waste received by a POTW is a "hazardous waste" as defined under the Federal Resource Conservation and Recovery Act (RCRA), the POTW must comply with additional Federal requirements. For a complete discussion of the legal, administrative, and technical methods of controlling hauled hazardous wastes, see the EPA Guidance Manual on the Identification of Hazardous Wastes Delivered to Publicly Owned Treatment Works by Truck, Rail, or Dedicated Pipeline.

A permit system is the most direct and efficient method of regulating waste haulers that discharge to a POTW. Implementing a permit system provides the opportunity to monitor and regulate haulers based on the treatment works' operating conditions.

Projected Septage Quantity

During the year 2004, Southeast Michigan Council of Governments (SEMCOG) in partnership with St. Clair County Health Department, St. Clair County Drain Commissioner, Macomb County Drain Commissioner, Macomb County Health Department prepared a feasibility study to locate additional septage disposal and treatment sites. In the report, the quantity of septage waste generated in each County was estimated. The total quantity of septage generated in Macomb County was estimated to be 5,588,000 gallons per year. The Macomb County Health Department felt that septage generated in central and western Macomb County would be disposed of at the Mount Clemens Wastewater Treatment Plant, while septage from the western portion of the County (west of Van Dyke) would continue to be disposed of in Detroit's system. The County estimated that two-thirds of the septage generated in the County is generated west of Van Dyke. This would leave one-third of the total generated in Macomb County that would be likely to go to the Mount Clemens WWTP. It is likely that septage from other neighboring counties (Oakland and St. Clair) can also be disposed of at the WWTP. To the north, land disposal sites are still readily available and to the south the Detroit disposal sites would be more convenient.

St. Clair County's septage was estimated to be 4,000,000 gallons per year from 20,000 on-site disposal systems. It was assumed that one third of this septage may be disposed at the Mount Clemens WWTP.

Most of the Oakland County septage is disposed at their septage disposal sites. However, there may be situations, unforeseen, that may warrant the use of Mount Clemens WWTP.

Maps of possible septage receiving service area within 15 mile radius and 25 mile radius from the WWTP are given in attachment A & B.

The following quantities of septage can be received and treated:

Domestic Treatment Plant Bio-Solids	8,000 gallons per day
Macomb County	10,450 gallons per day
St. Clair County	<u>3,800 gallons per day</u>
Total	22,250 gallons per day

Mount Clemens WWTP personnel also conducted a survey of the septage haulers operating in this vicinity. Based on these survey forms, it was estimated that approximately 16,800 gpd of septage would be disposed of at the Mount Clemens facility. In addition, about 8,000 gpd of bio-solids can be expected from various Domestic Treatment Plants. This would make a slightly less than 25,000 gpd of septage received at the plant. Again, this is based on septage being received 5 days per week, 35 weeks/year. During the year 2004, the WWTP received 1,671,000 gallons of septage and vector solids.

Based on these two estimates, it is determined that between 20,000 and 25,000 gpd of septage should be anticipated to be disposed of at the Mount Clemens WWTP. For your reference a copy of NPDES permit, Public Act 117, House Bill 5771, 5772, Basis of Design for the WWTP, Tabulation of current flows received, and current MDEQ reference materials are given in attachments C, D, E, F, G, and H.

Sampling Tests and Costs

Ideally, it would be preferable to sample each septage truck load before it is dumped into the plant to determine if it would be toxic. Unfortunately, testing for individual parameters would most likely be economically prohibitive. The costs for individual tests are estimated below:

Total Suspended Solids	\$ 30
Total Volatile Suspended Solids	\$ 30
Carbonaceous Biochemical Oxygen Demand	\$ 30
pH	<u>\$ 10</u>
Total	\$100 / sample

This cost would have to be borne by the hauler over and above the disposal cost. Obviously, this would prove to be prohibitively expensive to perform these analyses of every truckful. The City should, however, sample each hauler a minimum of four times per year to insure compliance and to build up the data based on incoming septage. These samples should be tested for the above parameters as well as total phosphorus, total solids, Total Heavy Metals, specifically cadmium, copper and zinc. The cost for these analyses would be \$150/sample.

It may still be desirable to test each load for toxicity prior to release to the plant, although it is probably not necessary. It is possible that a screening toxicity test called Microtox could be used. Microtox uses the bacteria that emit light. When a toxic material is introduced, the amount of light emitted will be reduced. The analyzer costs \$14,000. Toxicity screening using Microtox may be feasible. It would have an estimated cost of \$25.00 per tank load.

Based on information currently available, the following conclusions are made.

1. Adequate septage treatment capacity is available in the oxidation ditch.
2. WWTP has sufficient sludge holding capacity and is unlikely to be a limiting factor.
3. EPA recommendations limit the septage to 45,000 gpd with two days worth of septage equalization. This lower number reflects possible toxic impacts to the plant's biological treatment process. Without equalization, the EPA recommends limiting septage to 22,000 gpd. Currently, it is estimated that approximately 40,000 gpd of septage can be disposed of at the Mount Clemens Wastewater Treatment Plant.
4. Sampling of every truck would be prohibitively expensive. Each hauler sampled a minimum of four times per year for routine parameters would be sufficient.
5. The current rate for septage disposal is 4.7 cents per gallon; however it is recommended that the disposal fee be raised to 8.0 cents per gallon due to abnormal impacts of higher energy and treatment material prices to meet NPDES permit compliance.

III. A. Application Procedures

Federal regulations [40 CFR 403.5 (a (1))] prohibit non-domestic discharges of pollutants to a POTW, regardless of their mode of entry, that would cause pass through or interference. Waste hauler discharges to a POTW, fall within the scope of the General Pretreatment Regulations [40 CFR 403.8 (f)(1) and (2)]. These prohibitions apply not only to toxic pollutants, but also to excessive concentrations of conventional and non-conventional pollutants. In addition, if the load has originated from a categorical industry, it remains subject to EPA's categorical pretreatment standards (i.e., it cannot be introduced into the POTW unless it has been treated to the level prescribed by the applicable categorical standards). If the hauled waste received by a POTW is a "hazardous waste" as defined under the Federal Resource Conservation and Recovery Act (RCRA), the POTW must comply with additional Federal requirements. For a complete discussion of the legal, administrative, and technical methods of controlling hauled hazardous wastes, see the EPA Guidance Manual or the Identification of Hazardous Wastes Delivered to Publicly Owned Treatment Works by Truck, Rail, or Dedicated Pipeline.

A permit system is the most direct and efficient method of regulating waste haulers that discharge to a POTW. Implementing a permit system provides the opportunity to monitor and regulate haulers based on the treatment works' operating conditions.

When a Septic/Vactor hauler requests to dump their waste at the City of Mount Clemens WWTP the Director of Utilities is required to perform the following:

Send a letter requesting the following:

- Satisfactory evidence of liability insurance as described in Section III.B. of the Septic Hauler Discharge Permit.
- An affidavit for each vehicle which will dump at the WWTP. This will contain the information necessary to set the rate for disposal via tanker volume. Please include the VIN #.

*It is best to include a copy of the Septic Hauler Discharge Permit which describes the above requirements with your information request letter.

III.B. SEPTIC HAULER'S DISCHARGE PERMIT APPLICATION

A copy of the application is provided below:

**CITY OF MOUNT CLEMENS
UTILITIES DEPARTMENT
1750 CLARA STREET
MOUNT CLEMENS, MI 48043
(586) 469-6889**

SAMPLE COPY OF THE SEPTIC/VACTOR HAULER DISCHARGE PERMIT APPLICATION

To the City of Mount Clemens WWTP, Michigan:

From the: Firm Name: _____
Federal Tax Identification # _____
Address: _____
Telephone#: _____
Emergency Contact # _____
Authorized Representative: _____
Telephone # _____
Title: _____

The (firm name) _____ hereby requests a permit to discharge Septic/Vactor wastes into the Mount Clemens Wastewater Treatment Facilities.

The application must include the following information as part of the permit application:

- A. The permittee must carry liability insurance, and provide satisfactory evidence of it to the City of Mount Clemens, in such amounts and form as determined by the city of Mount Clemens. Such insurance shall afford compensation for taking corrective action and for bodily injury, and for property damage to the third persons caused by accidental releases.
- B. An affidavit is required to be on file with the City for each licenses truck prior to disposing of the wastes affirming that only septage wastes or sewer and catch-basin cleanings are being disposed of. _____
- C. A permit for \$250.00 is attached to this application.

Date: _____ Signed: _____

Application approved and permit granted.

Date: _____ Signed: _____

III.C SAMPLE COPY OF AN AFFIDAVIT

STATE OF MICHIGAN)

County of Michigan) ss
)

I, _____, being duly sworn deposes and
(NAME)
say that I am the _____ of _____, located
(TITLE) (NAME OF FIRM OR BUSINESS)
at _____
(ADDRESS)

I make this affidavit based on personal knowledge. I am authorized to make this affidavit on behalf of the above Company, and, further, state that I am licensed to haul and dispose septic tank sludge waste by appropriate regulatory agencies pursuant to septic tank waste transportation requirements.

License No. _____
Tax ID No: _____

I further state that the waste being disposed at the City of Mount Clemens Wastewater Treatment Plant for disposal and processing contains only septage waste approved by the receiving facility. These wastes are not catch-basin cleanings, nor industrial wastes, and further, they do not contain toxics or other forbidden deleterious matter.

The licensed truck is described as _____ and
has a maximum capacity of _____
VIN# _____

The foregoing statement has been read by me and its terms are fully understood.
Further, the above statements are true and correct to the best of my knowledge.

This statement is made subject to the penalty of perjury.

Subscribed and sworn to be this
_____ Day of _____, 20 ____.

Notary Public, _____, County, Michigan.
My Commission Expires: _____

III.D. PERMIT ISSUANCE

Upon receipt of satisfactory evidence of insurance and a notarized affidavit form for each tanker/vactor, a permit may be issued to a hauler. The duration of the permit is generally 5 years but is subject to the discretion of the WWTP Director of Utilities.

Any special conditions that the Director of Utilities wishes to impose on a hauler should be included in Section 4 of the permit. I.e., the steam cleaning of tanks which are also licensed hazardous waste prior to transportation of septic waste to the WWTP.

- Note:
- 1) The City of Mount Clemens may require analysis of any hauled waste prior to acceptance.
 - 2) All permitted Septic/Vactor haulers are subject to the same provisions as the industries and business included under the City of Mount Clemens Wastewater Treatment System Ordinance.

Permit No. _____

A SAMPLE COPY OF SEPTIC HAULER DISCHARGE PERMIT

In accordance with the provisions of the City of Mt. Clemens "Wastewater and Drainage Water Disposal Ordinance." (Code eff. Oct. 1958 amend. March 14, 1985).

Waste Hauler Name: _____

Location Address: _____

Authorized Representative: _____

Is hereby authorized to discharge hauled Septage to the City of Mount Clemens WWTP, located at 1750 Clara Street, Mount Clemens, MI 48043. In accordance with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of its obligation to comply with any applicable pretreatment regulations, standards or requirements under Federal, State, or local laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

Noncompliance with any term or condition of this permit shall constitute a violation of the City of Mount Clemens sewer use ordinance.

This permit shall become effective on _____ and shall expire at midnight on _____.

If the permittee wishes to continue to discharge after the expiration date of this permit, request must be filled for a renewal permit in accordance with the requirements of 25.092FF Sec. 7.5 of the City of Mount Clemens Wastewater and Drainage Disposal Ordinance, a minimum of 180 days prior to the expiration date.

If you wish to appeal or challenge any conditions imposed in this permit, a petition shall be filed for a variance of this permit in accordance with the requirements of Section 25.092JJ.1 within 30 days of your receipt of this correspondence.

By: _____
Director of Utilities

Issued on this _____ day of _____, 20_____.

SECTION 1: DISCHARGE REQUIREMENTS

- A. The discharge of all hauled wastes must be performed at the following designated area: City of Mount Clemens WWTP. Discharge to City of Mount Clemens sewer system at any other location is prohibited. The permittee must provide prior notice to the City of Mount Clemens of the intent to discharge and the actual discharge must be performed during supervision by plant personnel. In all cases, discharge may only be performed Monday through Friday 7:00 a.m. to 11:00 p.m. and 7:00 to 11:00 a.m. on weekends.
- B. Hauled wastes are subject to sampling by City of Mount Clemens. The hauler may also be required to suspend the discharging of wastes until the analysis is completed. The City of Mount Clemens reserves the right to refuse permission to dump any load.

SECTION 2: SPECIFIC LIMITATIONS

- A. Any commercial or industrial wastes that may cause pass through of pollutants or interference with the wastewater treatment plant operations or that violates Federal, State, or local restrictions shall not be discharged to the wastewater treatment plant.
- B. The permittee is prohibited from discharging wastes with the following characteristics.
- Having a pH lower than 5.0 or higher than 11.0
 - Containing fats, wax, grease, or oil of petroleum origin, whether emulsified or not, in excess of one hundred (100) mg/l or containing substances which may solidify or become viscous at temperatures between thirty-two (32°F) degrees and one hundred forth (140°F) degrees Fahrenheit (0° and 60° Centigrade);
 - Containing any gasoline, benzene, naphtha, fuel oil or other flammable or explosive liquids, solids or gases;
 - Having a temperature higher than 104°F (40°C);
 - Containing any ashes, cinders, sand, mud, straw, shaving, metal, glass, rags, feathers, tar, plastics, wood, paunch, manure, or any other solids or viscous substance capable of causing obstructions or other interferences with proper operation of the sewer system;
 - Containing any pollutant, including oxygen demanding pollutants (BOD, etc.) at flow rate and/or concentration which will cause a pass through of pollutants to occur or an interference with the City of Mount Clemens wastewater treatment facility's operations or sludge use and/or disposal practices.

- C. The permittee is prohibited from discharging wastes which exceed the following limitations:

Arsenic	1.9	mg/l
Cadmium	0.41	mg/l
Chromium	18.0	mg/l
Copper	6.0	mg/l
Cyanide	0.81	mg/l
Lead	6.5	mg/l
Mercury	0.0005	mg/l
Nickel	7.1	mg/l
Silver	0.610	mg/l
Zinc	5.4	mg/l
Oil & Grease	100	mg/l

SECTION 3: MONITORING AND RECORDS

- A. The City of Mount Clemens may require a Source Information List. The list shall contain information regarding the wastes from and the signature of, each waste generator. The hauler shall also sign the form, indicating that he has accepted no wastes other than those listed. The list may be reviewed by a City of Mount Clemens representative prior to discharge. Failure to accurately record every load, falsification of data, or failure to transmit the list to the plant operator prior to discharge may result in revocation of this permit.
- B. Any waste identified as coming from commercial or industrial users, as defined in 25.092BB, Sec. 3 may require sampling prior to pick-up by the waste hauler and the results of that sampling submitted to the City of Mount Clemens. The permittee must receive approval from City of Mount Clemens prior to pick-up and hauling of said commercial or industrial wastes.
- C. The permittee shall retain records of all monitoring information, Source Information Lists, copies of all reports required by this permit, and records of all data pertaining to hauled loads for a period of at least three years. This period may be extended by request of the City of Mount Clemens at any time.

SECTION 4 – SPECIAL CONDITIONS

- A. The permittee must carry liability Insurance, and provide satisfactory evidence of it to the City of Mount Clemens, in such amounts and form as determined by the City of Mount Clemens. Such insurance shall afford compensation for taking corrective action and for bodily injury, and for property damage to third persons caused by accidental releases.
- B. An affidavit is required to be on file with the City for each licensed truck PRIOR to disposing of the wastes, affirming that only domestic or approved commercial septage wastes are being disposed of.
- C. Payment must be made by Check or Money Order only at the time of delivery. NO CASH will be accepted. Check and money order shall be made payable to: City of Mount Clemens.
- D. The rate for disposal shall be based on the capacity of the tanks irrespective of whether the tanks are full or partially loaded.

IV. PROCEDURES FOR RECEIVING SEPTIC AND VACTOR WASTES

Upon entry into the City of Mount Clemens WWTP a permitted Septic/Vactor Hauler is required to report to the front office and submit the proper value check, money order or coupons. If the Septic Hauler is required to sample the load, the WWTP Operator will sample the load. The Septic Hauler should be instructed to split the sample for the hauler's record. The operator will record the sample and provide the results to the hauler.

IV.A. PROCEDURES FOR RECEIVING PAYMENTS FOR SEPTIC AND VACTOR WASTES

Dumpers may elect to purchase dumping coupons. The coupons come in a book of ten and are each valued at the proper amount for a single dump. The coupons contain a line in which the WWTP Clerk will enter the Septic/Vactor permit number along with an inventory number

All receipts along with used coupons are filed by the WWTP Clerk in the individual Septic/Vactor permit files.

All dump revenues are sent to the Accounting Department where they are recorded under ledger number 590-000.00-642.010.

IV. B. Sample Copy of the Septage Load and/or Vactor Truck Solids Disposal Receipt

CITY OF MOUNT CLEMENS – WASTEWATER TREATMENT DIVISION

SAMPLE COPY OF THE SEPTAGE LOAD /VACTOR TRUCK SOLIDS DISPOSAL RECEIPT

NAME OF COMPANY	_____	VENDOR'S SV NO.	_____
ADDRESS	_____	VENDOR'S SIGNATURE	_____
RECEIVED \$	_____	FOR	_____
RECEIVED BY		(WASTEWATER EMPLOYEE'S SIGNATURE)	
METHOD OF PAYMENT		INCLUDE CHECK OR MONEY ORDER NUMBER	

IV. C. SOURCE INFORMATION LIST PROGRAM

Section 3. A., of the Septic Hauler Discharge Permit states that a Sources Information List may be required for each load of waste discharged at the City of Mount Clemens WWTP.

This requirement became mandatory on December 1, 1990. Upon entry into the City of Mount Clemens WWTP a permitted Septic/Vactor Hauler is required to report to the front office and submit a Source Information List.

The completed form is processed and filed by the WWTP.

CITY OF MOUNT CLEMENS – WASTEWATER TREATMENT DIVISION SEPTIC/VACTOR DUMPING SOURCE INFORMATION LIST

Waste Hauling
Company Name _____

Waste Hauler
Permit No. _____

SV- _____

DATE	NAME AND ADDRESS OF CUSTOMER	CUSTOMER PHONE NUMBER	SOURCE OF WASTE	ESTIMATED VOLUME OF WASTE
1.	NAME			
Date	ADDRESS			
	CITY/ZIP:			
2.	NAME			
Date	ADDRESS			
	CITY/ZIP:			
3.	NAME			
Date	ADDRESS			
	CITY/ZIP:			

I certify that the information listed here is true, accurate and complete. I am aware of the conditions and requirements of the Septic Hauler Discharge Permit. I understand that failure to comply with the Permit may result in immediate suspension of the Permit and/or possible penalties as may be allowed by law.

DRIVER/OPERATOR _____

SIGNATURE _____

PLEASE PRINT

TO BE COMPLETED BY WWTP REPRESENTATIVE AT TIME OF DISCHARGE TO VACTOR STATION.

Date: _____

Time: _____

Information
Complete: _____

Sample
Collected: _____

Waste
Accepted By: _____

IV. D. STATE MANIFEST FOR VACTOR LOADS

The State of Michigan requires that vactor haulers also submit a State of Michigan Waste Manifest Report. The manifest form contains instructions for completing information and mailing the forms.

IV. E. PRE-APPROVAL OF NON-RESIDENTIAL HAULED WASTES

The City of Mount Clemens will accept hauled wastes from non-residential septic tank customers on a pre-approved basis. The decision to accept waste is based on the nature of the non-residential activity and any evidence that the septic waste is acceptable. ie, a sample may be taken for testing.

V. ENFORCEMENT RESPONSE PROGRAM

Table 7, as shown on the next page, serves two purposes for the City's Septic/Vactor Disposal Program. First, it identifies the anticipated violations and establishes the appropriate actions based on nature of the violation and other relevant factors.

Second, it promotes the consistent and timely use of enforcement remedies which, in addition to eliminating uncertainty concerning enforcement, lessens the likelihood of a successful challenge based on charges of "selective enforcement" or harassment.

Use of the guide involves straightforward application of the following procedure:

1. Identify general type of violation (boldface), then select the specific noncompliant situation (from column 1)
2. Identify nature of the particular violation (from column 2)
3. Obtain appropriate responses, which escalate in an ordered manner as needed to ensure a return to compliance (from column 3)
4. Identify responsible official to apply and a follow-up on the appropriate responses (from column 4)

Effectiveness Reassessment

The City will periodically re-evaluate the effectiveness of its enforcement response procedure relative to accomplishing existing and/or new program goals. This review will be conducted with the following objectives:

- Ensure violators return to compliance as soon as possible
- Penalize noncompliant users for pretreatment violation
- Deter future noncompliance
- Recover any additional expense attributable to the noncompliance.

**TABLE 7
ENFORCEMENT GUIDE**

GENERAL VIOLATION/ SPECIFIC SITUATION	NATURE OF NONCOMPLIANCE	APPROPRIATE RESPONSES*	RESPONSIBLE**
I. UNAUTHORIZED DISCHARGE			
A. No Permit, Where Required	1. User unaware of requirement; no harm to POTW/ environment	a. Phone call; NOV with permit application form	S
	2. User unaware of requirement; no harm to POTW/ environment	a. Cases and Desist Order	S, A
	3. Failure to apply continues after notification	a. AO, with possible fine b. Civil action and/or criminal prosecution c. Suspend service	S A S, A
B. Failure to Renew Permit, Where Required	1. Application not submitted by due date	a. Phone call; letter within 15 days b. NOV within 45 days	S S
	2. Failure to reapply continues after notification	a. AO with possible fine b. Civil action and/or criminal investigation c. Suspend service	S A S, A
C. Discharge of Materials Other Than In Permit Applications, Where Required	1. Unintentional; no impact on POTW or environment	a. NOV	S
	2. Harm to POTW or environment; or evidence of intent/ negligence	a. AO, with possible fine b. Civil action and/ or criminal prosecution	S A
	3. Recurring violation	a. Suspend service	S, A
II. VIOLATION OF DISCHARGE LIMITS			
A. Exceedance of Specified Limit and/or General Discharge Prohibition	1. Isolated/ not significant	a. Phone call and/or letter	S
	2. Isolated/significant; no harm to POTW or environment	a. NOV b. AO, with possible fine	S S
	3. Isolated/significant; harm to POTW or environment	a. AO, with possible fine	S
	4. Recurring; no harm to POTW/environment	a. NOV b. AO, with possible fine	S S
	5. Recurring/significant; harm to POTW or environment	a. Civil action b. Suspend service	A S, A

VI. CITY ORDINANCE

ORDINANCE REQUIREMENTS FOR SEPTIC DUMPING PROGRAM

The domestic sewage study rule which became effective on August 23, 1990 required the City of Mount Clemens to adopt ordinance language that will cover the following areas:

- Prohibit the discharge of trucked wastes except to designated points.
- Issue permit or equivalent control mechanisms for discharges of trucked or hauled wastes which incorporated this prohibition.

The following page contains language from the City of Mount Clemens Wastewater Treatment System Ordinance which pertains to hauled wastes.